

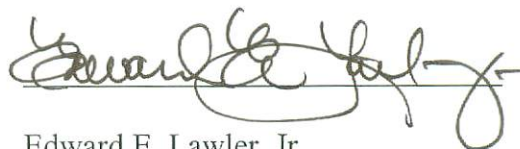
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: NORTHLAKE DEVELOPMENT, L.L.C.
Debtor

Case No. 06-01934-NPO
Chapter 11

AFFIDAVIT IN SUPPORT OF SANCTIONS

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Edward E. Lawler, Jr., attorney for BankPlus, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the request for reimbursement for attorneys' fees by BankPlus in connection with the improper filing of the bankruptcy petition by the Debtor and the employment of Earwood and Childers, PLLC as counsel for the Debtor as evidence of the bad faith filing of the Petition herein. The statement of McKay, Simpson, Lawler, Franklin & Foreman, PLLC, which is attached hereto as Exhibit "A," represents a detailed statement of reasonable fees associated with the Motion for Relief from Automatic Stay and Other Relief filed herein. Affiant hereby makes application for payment of such reasonable attorneys' fees as shown on Exhibit "A."



Edward E. Lawler, Jr.

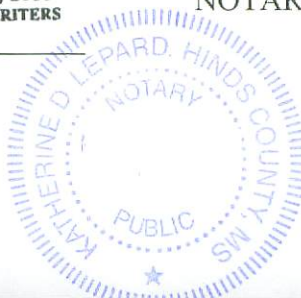
STATE OF MISSISSIPPI
COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 19th day of October, 2006.

NOTARY PUBLIC STATE OF MISSISSIPPI AT LAW
MY COMMISSION EXPIRES: Apr 29, 2010
BONDED THRU NOTARY PUBLIC UNDERWRITERS

MY COMMISSION EXPIRES _____

Katherine D. Lepard
NOTARY PUBLIC



McKay Simpson Lawler Franklin & Foreman, PLLC

Attorneys At Law

P. O. Box 2488 Ridgeland, MS 39158
601-572-8778
Fax 601-572-8779
WWW.MCKAYSIMPSON.COM

Tax Identification Number: 72-1376574

Mr. Tom Hudson, Esq.
BankPlus
400 Concourse, Suite 200
1068 Highland Colony Parkway
Ridgeland, MS 39157

October 13, 2006
File #: BKPLR-B0004
Inv #: 212096

In Reference To: Northlake Development, LLC

<u>Date</u>		<u>Description</u>	<u>Hours</u>
09/14/06	EEL	Telephone conferences by Mr. Lawler with Tom Hudson preparing for emergency hearing on Motion to Lift: extensive review of loan documentation in preparation for hearing; extensive review of file documentation from prior bankruptcy filing; emergency trial preparation for Motion to Lift Automatic Stay	3.00
09/15/06	EEL	Court appearance by Mr. Lawler in Bankruptcy Court regarding emergency Motion to Lift Automatic Stay; conferences with counsel opposite prior to hearing; meeting with T. Hudson and Paul Howell in preparation for testimony; presentation of arguments of counsel and proceed with hearing before Judge Olack; conf with T. Hudson and opposing counsel following hearing; review of foreclosure issues with Mr. Hudson following hearing	6.00
09/18/06	EEL	Receipt and review by Mr. Lawler of Order lifting stay from court	0.20
09/20/06	EEL	Preparation by Mr. Lawler of correspondence to R. Childers re Order lifting stay	0.20

09/27/06	EEL	Receipt and review by Mr. Lawler of Notice of Appeal filed by the debtor; Preparation by Mr. Lawler of correspondence to T. Hudson re same	0.30
----------	-----	--	------

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ed Lawler	9.70	\$225.00	\$2,182.50
Total Fees			\$2,182.50
Balance Due			\$2,182.50

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the above and foregoing Affidavit in Support of Sanctions on:

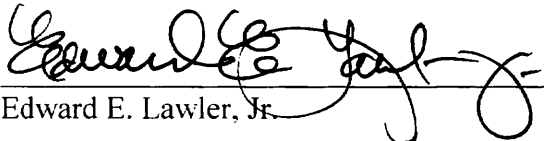
Robert B. Childers, Esq.
403 Towne Center Blvd., D-2
Ridgeland, MS 39157

Christopher James Steiskal
100 W. Capital, Ste. 706
Jackson, MS 39269

Ronald H. McAlpin, Esq.
100 W. Capital, Ste. 706
Jackson, MS 39269

James R. Mozingo, Esq.
Upshaw, Williams, Biggers, Beckham
& Riddick, L.L.P.
P. O. Box 9147
Jackson, MS 39286-9147

by facsimile and United States mail, postage prepaid, at the address listed above on this the 19th day of October, 2006.


Edward E. Lawler, Jr.